


UNITED STATES DISTRICT COURT

for the

Western District of Texas

FILED

JUL 14 2025

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY  DEPUTY CLERK

United States of America

v.

Edgar Josue Montelongo-Loera

Case No. 2:25-M-3042

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 12, 2025 in the county of Maverick in the
Western District of Texas, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. 933

Trafficking in Firearms

~~18 U.S.C. 932~~~~Straw Purchasing in Firearms~~

This criminal complaint is based on these facts:

SEE ATTACHMENT A.

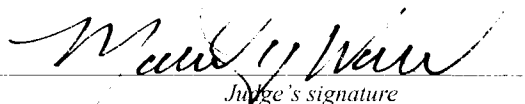
☒ Continued on the attached sheet.

Complainant's signature

Erendira Nihel Vivanco, ATF Task Force Officer

Printed name and title

Sworn to before me and signed in my presence.

Date: 07/14/2025

Judge's signature

City and state: Del Rio, Texas

Matthew H. Watters, United States Magistrate Judge

Printed name and title

ATTACHMENT A

1. ATF is investigating **Edgar Josue MONTELONGO-Loera** for violations of federal firearm laws. Your Affiant learned through this investigation that **MONTELONGO** is trafficking firearms to the country of Mexico.
2. On August 24, 2024, ATF opened an investigation on a person (hereinafter KLM) who had purchased several firearms and had seven multiple sale transaction reports between May 17, 2024, to October 18, 2024. The person purchased twelve (12) 380-caliber pistols, one 9 millimeter pistol, and one 22-caliber pistol. KLM had multiple crossings to and from the United States from Mexico via the Laredo, Texas Ports of Entry. ATF learned that KLM crossed the border with **Edgar Josue MONTELONGO-Loera** (hereinafter **MONTELONGO**). KLM and **MONTELONGO** have been recorded crossing to Mexico in a 2023 gray Toyota Camry with Texas plates THH4566.
3. On October 31, 2024, ATF agents conducted a non-custodial interview with KLM at a residence located at the 1500 block of Betty Drive, in San Antonio, Texas. KLM told ATF agents that she still had the firearms, but that the firearms were not at the residence because she did not want her children to be around the firearms. KLM told agents that the firearms were at a rental but could not recall the address. KLM told agents that her brother **MONTELONGO** also lives at the 1500 block Betty Drive address.
4. On July 12, 2025, Homeland Security Investigations (HSI) agents conducted surveillance at an HEB parking lot in Eagle Pass, Texas situated in the Western District of Texas. HSI agents

observed **MONTELONGO** driving the gray Toyota Camry with Texas plates THH4566.

HSI agents then observed **MONTELONGO** transfer a plastic bag, which contained seven Glock, Model 19x, 9 millimeter pistols, to **Jose Alberto DE LA CRUZ-Cardoza**, a non-immigrant alien (B1/B2 visa). **DE LA CRUZ** was driving a black Ford F-150 truck with Mexican Plates FA-2510-C.

5. After observing the transaction, HSI agents followed the Ford truck driven by **DE LA CRUZ** to the Eagle Pass, Texas Port of Entry where Customs and Border Protection (CBP) Officers stopped the vehicle. CBP officers inspected the Ford truck driven by **DE LA CRUZ** and located eight firearms concealed inside the vehicle.

6. In a post *Miranda* interview, **DE LA CRUZ** told ATF and HSI agents that the firearms were going to the country of Mexico and that he acquired the seven Glock, Model 19x, 9 millimeter pistols, from **MONTELONGO** at the HEB parking lot. The aforementioned Glock Model 19x pistols were manufactured outside the state of Texas and were identified as follows:

- Glock, Model 19x, 9 millimeter pistol bearing serial number CERF101.
- Glock, Model 19x, 9 millimeter pistol bearing serial number CEEL475.
- Glock, Model 19x, 9 millimeter pistol bearing serial number CERF581.
- Glock, Model 19x, 9 millimeter pistol bearing serial number CDUM852.
- ***Glock, Model 19x, 9 millimeter pistol bearing serial number CERF583.***
- Glock, Model 19x, 9 millimeter pistol bearing serial number CERT503.
- Glock, Model 19x, 9 millimeter pistol bearing serial number CDKP333.

7. Furthermore, ATF learned that the *Glock, Model 19x, 9 millimeter pistol bearing serial number CERF583* was purchased by **MONTELONGO** on July 11, 2025, a day before transferring the firearm to **DE LA CRUZ**. **MONTELONGO** purchased the aforementioned Glock pistol at an Academy Sports and Outdoors store in San Antonio, Texas which is in the Western District of Texas.
8. Based on the foregoing facts, I believe that probable cause exists to establish that **Edgar Jose MONTELONGO**, conspired to ship, transport, transfer, caused to be transported, or otherwise dispose of at least seven firearms to another person in or otherwise affecting both interstate and foreign commerce, and having reasonable cause to believe that the use, carrying, or possession of the firearms by the recipient would constitute a felony in violation of **Title 18, United States Code 933**.